

Message

---

**From:** Hough, Palmer [Hough.Palmer@epa.gov]  
**Sent:** 2/27/2020 10:48:44 PM  
**To:** Vaughan, Molly [Vaughan.Molly@epa.gov]; LaCroix, Matthew [LaCroix.Matthew@epa.gov]  
**CC:** McCracken, Betsy W. [mccracken.betsy@epa.gov]; Schofield, Kate [Schofield.Kate@epa.gov]  
**Subject:** RE: Please Review - Pebble Pre-FEIS

Molly/Matt

I've finished putting my comments in the Wetlands, Fish, and Compensatory Mitigation tables that Matt set up for us.

What are the next steps in compiling and polishing these sets of comments?

-Palmer

---

**From:** Hough, Palmer  
**Sent:** Wednesday, February 26, 2020 5:23 PM  
**To:** Vaughan, Molly <Vaughan.Molly@epa.gov>; LaCroix, Matthew <LaCroix.Matthew@epa.gov>  
**Cc:** McCracken, Betsy W. <mccracken.betsy@epa.gov>; Schofield, Kate <Schofield.Kate@epa.gov>  
**Subject:** RE: Please Review - Pebble Pre-FEIS

Molly/Matt

I'm not done putting my comments in the Wetlands, Fish, and Compensatory Mitigation tables that Matt set up for us.

My plan is to get that done before you get into work tomorrow.

-Palmer

---

**From:** Vaughan, Molly <Vaughan.Molly@epa.gov>  
**Sent:** Tuesday, February 25, 2020 2:33 PM  
**To:** McGrath, Patricia <m McGrath.patricia@epa.gov>; Godsey, Cindi <Godsey.Cindi@epa.gov>; Pepple, Karl <Pepple.Karl@epa.gov>; McAlpine, Jerrold <McAlpine.Jay@epa.gov>; Palomaki, Ashley <Palomaki.Ashley@epa.gov>; Hough, Palmer <Hough.Palmer@epa.gov>; Maley, Timothy <maley.timothy@epa.gov>; Eckley, Chris <Eckley.Chris@epa.gov>; Butler, Barbara <Butler.Barbara@epa.gov>; Schofield, Kate <Schofield.Kate@epa.gov>; Muche, Muluken <Muche.Muluken@epa.gov>; Barnhart, Megan <barnhart.megan@epa.gov>; McCracken, Betsy W. <mccracken.betsy@epa.gov>; Herbst, John <herbst.john@epa.gov>; LaCroix, Matthew <LaCroix.Matthew@epa.gov>; Jensen, Amy A. <jensen.amy@epa.gov>; Clabaugh, Charles D. <clabaugh.charles@epa.gov>; Rountree, Marthea <Rountree.Marthea@epa.gov>; Kravitz, Michael <kravitz.michael@epa.gov>; Davis, Michelle V. <Davis.MichelleV@epa.gov>; Barton, Justine <Barton.Justine@epa.gov>; Papenfus, Michael <Papenfus.Michael@epa.gov>; Ebersole, Joe <Ebersole.Joe@epa.gov>  
**Subject:** RE: Please Review - Pebble Pre-FEIS

Hi Again,

I apologize for another update, but I realized that my initial email referenced the Draft SOCs/responses distributed in November, and did not draw your attention to Appendix D, which contains updated responses. Based on my review so far, most of the responses have not changed from the draft we previously reviewed. However, for some of the SOCs that were discussed in the November meetings, the responses have been modified to reflect any changes in approach that came out of those meetings. Others have had minor edits to more clearly state whether changes were or were not made to the document in response to the comment. Again, my apologies for not including Appendix D in my original email.

Regards,

Molly

---

**From:** Vaughan, Molly

**Sent:** Monday, February 24, 2020 11:24 AM

**To:** McGrath, Patricia <[mcgrath.patricia@epa.gov](mailto:mcgrath.patricia@epa.gov)>; 'Godsey, Cindi' <[Godsey.Cindi@epa.gov](mailto:Godsey.Cindi@epa.gov)>; 'Pepple, Karl' <[Pepple.Karl@epa.gov](mailto:Pepple.Karl@epa.gov)>; 'McAlpine, Jerrold' <[McAlpine.Jay@epa.gov](mailto:McAlpine.Jay@epa.gov)>; 'Palomaki, Ashley' <[Palomaki.Ashley@epa.gov](mailto:Palomaki.Ashley@epa.gov)>; 'Hough, Palmer' <[Hough.Palmer@epa.gov](mailto:Hough.Palmer@epa.gov)>; 'Maley, Timothy' <[maley.timothy@epa.gov](mailto:maley.timothy@epa.gov)>; 'Eckley, Chris' <[Eckley.Chris@epa.gov](mailto:Eckley.Chris@epa.gov)>; 'Butler, Barbara' <[Butler.Barbara@epa.gov](mailto:Butler.Barbara@epa.gov)>; 'Schofield, Kate' <[Schofield.Kate@epa.gov](mailto:Schofield.Kate@epa.gov)>; 'Muche, Muluken' <[Muche.Muluken@epa.gov](mailto:Muche.Muluken@epa.gov)>; 'Barnhart, Megan' <[barnhart.megan@epa.gov](mailto:barnhart.megan@epa.gov)>; 'McCracken, Betsy W.' <[mccracken.betsy@epa.gov](mailto:mccracken.betsy@epa.gov)>; 'Herbst, John' <[herbst.john@epa.gov](mailto:herbst.john@epa.gov)>; 'LaCroix, Matthew' <[LaCroix.Matthew@epa.gov](mailto:LaCroix.Matthew@epa.gov)>; 'Jensen, Amy A.' <[jensen.amy@epa.gov](mailto:jensen.amy@epa.gov)>; Clabaugh, Charles D. <[clabaugh.charles@epa.gov](mailto:clabaugh.charles@epa.gov)>; Rountree, Marthea <[Rountree.Marthea@epa.gov](mailto:Rountree.Marthea@epa.gov)>; Kravitz, Michael <[kravitz.michael@epa.gov](mailto:kravitz.michael@epa.gov)>; Davis, Michelle V. <[Davis.MichelleV@epa.gov](mailto:Davis.MichelleV@epa.gov)>; Barton, Justine <[Barton.Justine@epa.gov](mailto:Barton.Justine@epa.gov)>; Papenfus, Michael <[Papenfus.Michael@epa.gov](mailto:Papenfus.Michael@epa.gov)>; Ebersole, Joe <[Ebersole.Joe@epa.gov](mailto:Ebersole.Joe@epa.gov)>

**Subject:** RE: Please Review - Pebble Pre-FEIS

Hi Pebble Team,

I hope that the review of the Preliminary FEIS is going well. As you are finishing your review and drafting your comments, I wanted to share some direction received from the NEPA Compliance Division at Headquarters regarding the format for comments. This is not different from our typical approach for NEPA comments, but seeing this full list in one place may be helpful. Please consider the following when drafting your comments:

- concise comments;
- confirm the comments are not addressing issues the Corps already confirmed are out of scope in previous technical meetings;
- making sure the comments are addressing the response to the comment/new information (vs. reiterating the previous comment) consistent with our guidance; and
- making clear where the comment is NEPA vs. 404.

Please let me know if you have any questions.

Thank you,

Molly

---

**From:** Vaughan, Molly

**Sent:** Thursday, February 06, 2020 2:49 PM

**To:** McGrath, Patricia <[mcgrath.patricia@epa.gov](mailto:mcgrath.patricia@epa.gov)>; Godsey, Cindi <[Godsey.Cindi@epa.gov](mailto:Godsey.Cindi@epa.gov)>; Pepple, Karl <[Pepple.Karl@epa.gov](mailto:Pepple.Karl@epa.gov)>; McAlpine, Jerrold <[McAlpine.Jay@epa.gov](mailto:McAlpine.Jay@epa.gov)>; Palomaki, Ashley <[Palomaki.Ashley@epa.gov](mailto:Palomaki.Ashley@epa.gov)>; Hough, Palmer <[Hough.Palmer@epa.gov](mailto:Hough.Palmer@epa.gov)>; Maley, Timothy <[maley.timothy@epa.gov](mailto:maley.timothy@epa.gov)>; Eckley, Chris <[Eckley.Chris@epa.gov](mailto:Eckley.Chris@epa.gov)>; Butler, Barbara <[Butler.Barbara@epa.gov](mailto:Butler.Barbara@epa.gov)>; Schofield, Kate <[Schofield.Kate@epa.gov](mailto:Schofield.Kate@epa.gov)>; Muche, Muluken <[Muche.Muluken@epa.gov](mailto:Muche.Muluken@epa.gov)>; Barnhart, Megan <[barnhart.megan@epa.gov](mailto:barnhart.megan@epa.gov)>; McCracken, Betsy W. <[mccracken.betsy@epa.gov](mailto:mccracken.betsy@epa.gov)>; Herbst, John <[herbst.john@epa.gov](mailto:herbst.john@epa.gov)>; LaCroix, Matthew <[LaCroix.Matthew@epa.gov](mailto:LaCroix.Matthew@epa.gov)>; Jensen, Amy A. <[jensen.amy@epa.gov](mailto:jensen.amy@epa.gov)>; Clabaugh, Charles D. <[clabaugh.charles@epa.gov](mailto:clabaugh.charles@epa.gov)>; Rountree, Marthea <[Rountree.Marthea@epa.gov](mailto:Rountree.Marthea@epa.gov)>; Kravitz, Michael <[kravitz.michael@epa.gov](mailto:kravitz.michael@epa.gov)>; Davis, Michelle V. <[Davis.MichelleV@epa.gov](mailto:Davis.MichelleV@epa.gov)>; Barton, Justine <[Barton.Justine@epa.gov](mailto:Barton.Justine@epa.gov)>; Papenfus, Michael <[Papenfus.Michael@epa.gov](mailto:Papenfus.Michael@epa.gov)>; Ebersole, Joe <[Ebersole.Joe@epa.gov](mailto:Ebersole.Joe@epa.gov)>

**Subject:** Please Review - Pebble Pre-FEIS

Hello All,

As anticipated, we have received the Preliminary Final EIS for Cooperating Agency Review. I have downloaded all of the documents, and they are now on the SharePoint site in the [Pre-FEIS Files](#) folder. I have also attached an email from AECOM, with instructions for how to download all files from the ftp site as a zip file, if you would prefer to access them

that way. (Note, I have not had time to copy all of the Figures to the SharePoint site, and will do this when I return to the office on Monday.)

The Corps has requested that we use the attached comment form for comments, so please email me your comments in this table format.

In order to stick with the management-approved review schedule, I would appreciate if you could complete your review and send me your comments by **COB Wednesday Feb. 26<sup>th</sup>**. I realize that this is a quick turnaround, but it will allow time to compile the comments, prepare a first draft of the complete table for management review, identify key issues, brief management, and have internal pre-meetings on key topics... all before the scheduled week of Cooperating Agency Technical Meetings March 9-13<sup>th</sup>. Following those meetings, there will be a few days for revising the comments as needed based on technical discussions at the meetings, and briefing management one more time before finalizing the comments.

I know we have all been working on this project for a long time now, but if you need any memory refreshing on what we said before, our complete [NEPA comment letter](#) on the DEIS is on the SharePoint site. You may also want to look again at the Corps responses to comments received on the Draft EIS. The [Nov 2019 Technical Meetings](#) folder includes table of all of the Statements of Concern and draft responses (“Draft SOCs and Responses Handout”), as well as a specific table of EPA’s comments (“EPA comment response matrix”) indicating which SOC each comment was included in.

Typically, our review and comments at the Preliminary Final stage focus on how the revisions to the document address the comments we provided on the Draft EIS, or on new information added to the document.

In case it is helpful to focus your review, here are some suggested section “assignments,” based on the DEIS review:

- Chapter 2/Appendix K2 Alternatives and Applicants Proposed Action: Patty, Cindi, Barb, Matt, Justine (port alternatives)
- 3.1/4.1 & Appendix K3: Introduction of Affected Environment/Introduction to Environmental Consequences: Patty
- 3.4/4.4 Environmental Justice: Molly
- 3.6/4.6/Appendix K3.6 Commercial and Recreational Fisheries: Mike P., Joe, Palmer, Betsy
- 3.9/4.9/Appendix K3.9 Subsistence: Michelle
- 3.13/4.13 Geology: Cindi
- 3.14/4.14 Soils: Matt, Palmer
- 3.15/4.15 & Appendix K3.15/K4.15 Geohazards: Patty
- 3.16/4.16 & Appendix K3.16/K4.16 Surface Water Hydrology: Don, Tim, Muluken, Justine, Matt, Palmer, Kate
- 3.17/4.17 & Appendix K3.17/K4.17 Groundwater Hydrology: Don, Tim, Muluken
- 3.18/4.18 & Appendix K3.18 K4.18 Water and Sediment Quality: Cindi, Chris, Tim, Barb, Don, Kate, Justine (port alternatives)
- 3.20/4.20/Appendix K4.20 Air Quality: Jay, Karl
- 3.22/4.22/ Appendix K4.22 Wetlands: Matt, Palmer, Kate
- 3.24/4.24 Fish Values: Joe, Mike P., Palmer, Betsy, Kate
- 3.26/4.26 & Appendix K3.26 Vegetation: Matt, Palmer
- 4.27 Spill Risk: Patty, Barb
- Chapter 5/Appendix M Mitigation: Matt, Palmer, Patty, Barb, Cindi
- Appendix B Alternatives Screening: Patty, Barb, Cindi, Matt
- Appendix I EFH Assessment: Mike P, Palmer, Betsy
- Appendix J PJD: Matt, Palmer
- Transportation Corridor portions of various resource sections: Mike K

Thank you for reviewing the Pre-FEIS, and for all your work on this project to get us to this point. If you anticipate issues with being able to complete review by Feb 26, please let me know as soon as possible.

Thanks,  
Molly

Molly Vaughan  
Policy and Environmental Review Branch  
U.S. EPA Region 10, Alaska Operations Office  
907-271-1215  
[vaughan.molly@epa.gov](mailto:vaughan.molly@epa.gov)